

Memorandum for the Record



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To: The File

Through: Denise Long, Environmental Analyst, DEP/NERO/BWSC/SMP
Stephen Johnson, Section Chief, DEP/NERO/BWSC/SMP

From: Margaret Chen, Environmental Analyst, DEP/NERO/BWSC/SMP

Date: June 7, 1994

RE: MIDDLETON - Adhesive Manufacturer, School Street
Release Tracking No. 3-0128
Site Inspection

DAJ
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The purpose of this memorandum is to summarize observations made during a May 3, 1994, Department of Environmental Protection (DEP) site inspection conducted at the Adhesive Manufacturer site, located on School Street in Middleton, Massachusetts. The site inspection was conducted in response to Town Administrator Ira Singer's request for continued DEP involvement in this case. The writer was accompanied by John Keating of DEP/NERO's Hazardous Waste Compliance section, who was assessing the site for issues relating to Massachusetts General Law (M.G.L.) Chapter 21C, the Massachusetts Hazardous Waste Management Act. Cheryl Auterio, Operating Manager of the former American Glue & Resin, Inc., and daughter of the current owner, Patricia Auterio, was also on-site during the inspection.

Background

The former American Glue & Resin, Inc. (American Glue) was a manufacturer of custom adhesives, with the main products being water-based adhesives and corn dextrin. Information available in the case file indicates that ingredients used in the glue mixture and other activities at the site include: polyvinyl acetate, ethylene vinyl acetate, toluene, 1,1,1-trichloroethane, alcohol, formaldehyde, caustics (such as chlorox), and acids. A Materials Safety Data Sheet (MSDS) is available for each of the glues manufactured at the facility. Most of the glues manufactured contained no hazardous materials. A small number of the glues manufactured contained small percentages, less than 15%, of hazardous materials, such as toluene or 1,1,1-trichloroethane.

An anonymous complaint filed with DEP's Division of Water Pollution Control in 1985 resulted in an inspection and subsequent discovery of contamination at the site. Environmental assessments were conducted at the site and abutting properties through the late 1980's by environmental consultants hired by American Glue (under DEP oversight). These assessments revealed that aromatic and chlorinated hydrocarbons had impacted the subsurface soil and groundwater, as well as the bedrock wells located on-site and at an abutting residence (34 School Street). The residence was

uninhabitable as a result of the level of contamination detected in the private drinking water supply. The glue factory ceased operations in the early part of 1992.

Site Inspection

American Glue is located at 40 School Street in Middleton. The site is abutted to the north and northwest by Boston Brook, to the east by 42 School Street (Tom Sawyer Beverage Company), to the southwest by 34 School Street (a residence), and to the southeast by School Street. Across School Street from the site is a small pond and wetlands area.

The site inspection was limited to the southeastern portion of the site occupied by the manufacturing building. Two "vault-like" structures encasing the openings to the site's private water supply wells were observed on the southeastern side of the building, one directly in front of the building and one on the southeastern corner of the building.

A loading area was observed east of the building. Two box trucks and six tractor trailers were observed parked in the loading area. According to Ms. Auterio, two of the trailers stored 55-gallon drums containing wastewater from the cleaning of process vats and glue totes (metal storage containers). The two trailers that Ms. Auterio pointed out were parked over a catch basin, which is part of a culvert system that channels a small stream from the pond and wetlands area across School Street through the American Glue property. Ms. Auterio also stated that the other trailers stored empty 55-gallon drums and one of the box trucks contained empty 5-gallon buckets. No obvious signs of stains or leaks were observed in the area of the trailers and trucks. Two 275-gallon above-ground storage tanks were observed leaning against the east side of the manufacturing building. These tanks were not connected to the facility and appeared to be empty. Facing the loading bay door on the eastern side of the building, a number of what appeared to be empty totes and 55-gallon drums were observed on the left-hand side and two large wastewater holding tanks were observed on the right-hand side.

A metal storage shed was located northeast of the manufacturing building. Wooden pallets were stacked along the outer southeast wall of the shed. Dozens of 55-gallon drums were observed in the storage shed. According to Ms. Auterio, these drums were empty. An interior inspection of the storage shed was not possible due to the filled capacity of the shed.

Two standpipes from groundwater monitoring wells installed as part of additional Phase II work in 1988 were observed southeast of the storage shed. Ms. Auterio pointed out that the latch where the

cap locks to the standpipe had been broken and voiced concerns that someone may have compromised the well on purpose.

Two underground storage tanks (USTs), a 5,000-gallon toluene UST and a 2,000-gallon #2 fuel oil UST, are located southwest of the manufacturing building. The toluene tank was installed to replace an older toluene tank removed in March 1987. The age of the fuel oil tank is unknown. These two USTs have not been in use since the facility ceased operations in 1992 and would be considered abandoned according to 527 CMR 9.00, Board of Fire Prevention Regulations.

An interior inspection revealed an office area on the southeast (front) side of the building. Adjoining the offices to the west was a small room with a laboratory-like set up with workbenches and storage shelves. Various small sized containers of polymers, caustics, acids, and other compounds were observed on the shelves, tables, and floor of this room. The manufacturing/warehouse area was located on the northwest portion of the building. A number of stainless steel tanks, dozens of totes, and approximately 100-200 drums were observed in the manufacturing/warehouse area, as well as manufacturing equipment, another truck filled with drums, bags of starches on pallets, and a couple of partially empty containers of acids and caustics. According to Ms. Auterio, only a small number of drums, approximately one to maybe two dozen, contain any remaining glue product left on-site. Ms. Auterio also stated that some of the drums in the warehouse area also contained wastewater generated from the washing of tanks and equipment when the company shut down for business. In total, Ms. Auterio estimated that there are over 5,000 gallons of industrial wastewater contained in the drums in the trailers and in the containers in the warehouse combined.

Conclusions/Recommendations

Based on observations made during the site inspection, there appear to be two areas where a threat of release of oil/hazardous materials exist. One of the areas is southwest of the manufacturing building where the USTs are located. Since it is unclear whether the product from the toluene and fuel oil tanks has been removed, the USTs in their abandoned state are a threat of release and should be removed. The second area is east of the manufacturing building where two trailers containing drums with wastewater are parked over a catch basin. Since some of the drums are in poor condition, it is necessary that the drums and their contents be removed to prevent a release of oil and hazardous materials from occurring. Information available in the case file indicates that the floor drains in the manufacturing building had been sealed in October 1986. Thus the likelihood of a threat of release from the drums in the manufacturing building to the environment is reduced.

According to Mr. Keating's assessment of the site, the two or three containers of partially empty acids and caustics may be presumed to be hazardous, but since they are "virgin" product, they may still be of use to another manufacturer. Overall, there does not readily appear to be any 21C issues here, with the exception of the wastewater issue. Mr. Keating stated that there is a possibility that the wastewater could be characteristic hazardous waste, but the possibility is remote due to the fact that most of the glues that were manufactured at the facility would be nonhazardous since they were manufactured for envelopes and food containers.

During the inspection at the site, it was observed that the abutting residence, 34 School Street, which has historically been unoccupied due to contamination of the private drinking water well by aromatic and chlorinated hydrocarbons, was being well kept and appeared to be occupied. The writer has attempted to reach the previous contact, Mrs. Sandra Pollock, to ascertain whether the house has been reoccupied. If this residence is indeed being occupied, a sampling of the water from the well will be necessary. In a telephone conversation held between the Health Agent, Leo Cormier, and the writer on June 7, 1994, Mr. Cormier stated that he never reissued an occupancy permit for the 34 School Street residence and that as far as he is aware, the residence is not occupied. The writer will continue to determine if this house is being occupied presently, and if so, to sample the water supply well.

Although Ms. Auterio has indicated to the writer that she has been working to engage contractors to remove the various trailers and drums, industrial wastewater and other items at the site, DEP will be sending correspondence to the owner of American Glue in order to ensure that this work is conducted in a timely fashion. In addition, the monitoring wells on-site should be located and a round of groundwater sampling should be conducted to determine current site conditions.

